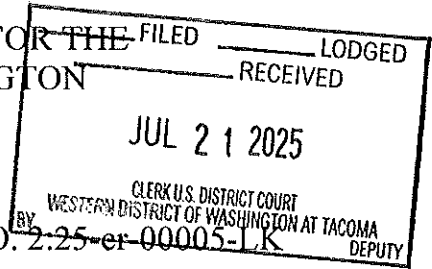


UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE



UNITED STATES OF AMERICA,
Plaintiff

v.

BRANDEN TRAGER and
MAYHEM SERVICES, LLC,
Defendants.

CASE NO. 2:25-cr-00005-LK

SUPERSEDING INFORMATION

18 U.S.C. § 2
16 U.S.C. §§ 3372 and 3373

The Acting Assistant Attorney General charges that:

COUNT 1
Lacey Act Trafficking

DEFENDANTS

1. **BRANDEN TRAGER** was a U.S. citizen residing in Brush Prairie, Washington, and the registered owner and agent of **MAYHEM SERVICES, LLC**.

2. **MAYHEM SERVICES, LLC**, ("**MAYHEM**") was a business incorporated in the State of Washington with its headquarters in Brush Prairie, Washington. **MAYHEM** was in the business of organizing and providing guides for hunting and fishing trips in the Pacific Northwest.

3. **MAYHEM**, acting through its agents and employees, including **TRAGER**, who were acting within the scope of their agency and employment for the intended benefit, at least in part, of **MAYHEM**, did arrange to illegally guide bird-hunting trips in Canada and illegally take and transport migratory birds in Washington.

4. Between on or about November 1, 2022, and on or about January 15, 2023, in the Western District of Washington and elsewhere, defendants **TRAGER** and **MAYHEM** did knowingly engage in conduct that involved the sale and purchase of wildlife and did knowingly transport and attempt to transport said wildlife that in the exercise of due care they should have known were taken and possessed in violation of, and in a manner unlawful under, any law, regulation, and treaty of the United States and in violation of foreign law, specifically the Migratory Bird Treaty Act (16 U.S.C. § 703), 50 C.F.R. §§ 10, 20, and British Columbia Wildlife Act Hunting Regulation §§ 1(1), 12(a)(vi), 14(b), 15(j), 48(1)(a), 51(1)(a)(i).

All in violation of Title 16, United States Code, Sections 3372(a)(1), 3372(a)(2)(A), 3372(a)(4), and 3373(d)(2), and Title 18, United States Code, Section 2.

ADAM GUSTAFSON
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